

S.N. 09/976,564  
ATTY DOCKET NO. 13DV14147

### REMARKS

Applicants respectfully request that the above application, as amended, be reconsidered. Claims 1-24 are currently pending.

At page 1 of the Office Action (see paragraph 1), the Examiner has objected to Claim 8 because of an informality in line 2. Responsive to this objection, Applicants have amended Claim 8 to correct this informality. Applicants further submit that this amendment merely corrects the indicated informality and in no way changes the scope of the instant Claims, as filed.

Claims 6 has been amended and new Claim 24 has been added to recite that the cladding is positioned along one edge of the airfoil and that the cladding positioned along this edge is treated with the etchant to remove at least a portion of the adhered cladding from the substrate along this edge. Support for this amendment to Claim 6 and for new Claim 24 can be found in paragraphs [0014] and [0016] at page 5 of the above application. Claim 14 has also been amended to recite that the cladding positioned along the edge of the airfoil is what is treated with the chemical etchant.

Applicants have also added new Claim 22 which recites the method of Claim 1, but additionally recites that the substrate comprises a composite material selected from the group consisting of metallic composites and nonmetallic composites. Support for new Claim 22 can be found in Claim 1 as originally filed and from a combined reading of paragraph [0007] at page 3, and paragraph [0013] at page 4, of the above application. New Claim 23 has also been added which recites that the substrate is a nonmetallic composite. Support for new Claim 23 can also be found in paragraph [0013] at page 4 of the above application.

Applicants also note that the Examiner has not made of record the documents that that were listed on the PTO-1449 form attached to the Supplemental Information Disclosure Statement that was submitted on February 20, 2003 and prior to the mailing date of the current Office Action. In accordance with MPEP 609, the Examiner is again requested to initial the documents listed on the enclosed copy of that PTO-1449 form in the space provided, make a copy of this initialed form, and return that copy to Applicants' attorney.

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**A. Response to Rejection of Claims 1-3, 5-6 and 13 under 35 USC 102(b) as Anticipated by Lada et al**

At page 2 of the Office Action (see paragraph 3), the Examiner has rejected Claims 1-3, 5-6 and 13 under 35 USC 102(b) as anticipated by U.S. Patent 4,339,282 (Lada et al):

1. Regarding Claims 1 and 13, the Examiner says Lada et al discloses a method for removing a metal coating from nickel supper alloys from an airfoil such as gas turbine blades using a chemical etchant, which avoids attacking the nickel super alloy (referring to col. 2, lines 29-47).
2. Regarding Claims 2-3, the Examiner says Lada et al (referring to col. 2, lines 31-35) teaches a chemical etchant that is an aqueous solution comprising strong acid such as hydrochloric acid and nitric acid.
3. Regarding Claim 5, the Examiner says Lada et al (referring to col. 2, lines 39-46) teaches a stripping or removal step that includes a metal-coated supper alloy immersed into the solution for a period of time until the coating is removed from the surface of the super alloy.
4. Regarding Claim 6, the Examiner says Lada et al (referring col. 1, lines 25-36) inherently teaches a turbine blade that has coating or cladding along an edge of the blade because Lada et al teaches a blade having an edge that is coated with metal, which could be removed.

Applicants respectfully traverse this rejection. Contrary to what the Examiner suggests, the method of Lada et al is not the same or similar to the method of Claims 1-3, 5-6 and 13, as amended. Specifically, the method of Lada et al removes an aluminide coating from the nickel super alloy substrate with a stripping solution having nitric and hydrochloric acid. See col. 2, lines 29-35. A coating is simply a layer of one substance covering another. See enclosed copy of page 219 from Merriam Webster's Collegiate Dictionary (Tenth Edition 1997). By contrast, the Applicants' claimed method removes

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a cladding adhered to a substrate by treating the cladding with the chemical etchant. See, for example, Claim 1. See also enclosed copy of page 210 from Merriam Webster's Collegiate Dictionary (Tenth Edition 1997) which suggests that a "cladding," unlike coatings in general, is bonded to the substrate. In other words, the "aluminide coating" removed by the method of Lada et al is not the same as the "cladding adhered to a substrate" that is removed by the method of Claims 1-3, -5-6 and 13, as amended.

Applicants submit that the method of Claim 6, as amended, as well as new Claim 24, is distinguishable over Lada et al for an additional reason. In the method of Lada et al, the aluminide coating covers the entire nickel super alloy substrate and is removed in its entirety. In other words, the method of Lada et al does not selectively remove the aluminide coating from the turbine blade, e.g., along an edge thereof. By contrast, the method of amended Claim 6 and new Claim 24 recite that the cladding is positioned along one edge of the airfoil and that the cladding positioned along this edge is treated with the etchant to remove at least a portion of the adhered cladding from the substrate along this edge. Unlike Lada et al, the method of amended Claim 6 and new Claim 24 selectively treats and removes only the cladding adhered to the substrate along the one edge of the airfoil.

Applicants further submit that the method of new Claims 22-23 are distinguishable over Lada et al for yet an additional reason. New Claim 22 recites that the substrate that the cladding is adhered to comprises a composite material selected from the group consisting of metallic composites and nonmetallic composites. New Claim 23 further recites that the substrate is a nonmetallic composite. By contrast, the method of Lada et al removes the aluminide coating from a metallic nickel super alloy that is not a composite material. In particular, Lada et al does not teach removing coatings from nonmetallic composites according to new Claim 23.

For the forgoing reasons, Applicants submit that Claims 1-3, 5-6, 18 and 22-24, as amended, are novel in view of, as well as unobvious over, Lada et al.

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**B. Response to Rejection of Claims 4, 7-12 and 14-21 under 35 USC 103(a) as Unpatentable Over Lada et al, in View of Hinson**

At pages 3-5 of the Office Action (see paragraph 6), the Examiner has rejected Claims 4, 7-12 and 14-21 under 35 USC 103(a) as unpatentable over Lada et al, in view of U.S. Patent 5,705,082 (Hinson):

1. The Examiner relies on Lada et al as per the rejection of Claims 1-3, 5-6 and 13 and also to teach (referring to col. 2, lines 51-54) a coating or cladding made of a titanium alloy.
2. Regarding Claim 4, the Examiner acknowledges that Lada et al fails to teach that the acid is hydrofluoric acid. However, the Examiner alleges that "in a method for removing metal such as titanium used to form a protective sheath for composites such as a leading edge for a fan blade, [Hinson teaches] using an acid solution which can be hydrochloric, hydrofluoric, sulfuric, nitric acid (referring to col. 2, lines 14-25 and lines 66- col. 3, lines 2-4). The Examiner therefore concludes that it would have been obvious invention to combine Hinson's teaching into Lada et al's process "because both the hydrochloric and hydrofluoric acid are functionally equivalent for efficient removal of titanium as taught by Hinson."
3. Regarding Claims 7, 9, 11 and 14, the Examiner says Hinson (referring to col. 2, lines 21-25) teaches a blade having an internal surface of titanium at the leading edge. The Examiner further concludes it would have been obvious to have an interior and a perimeter section of the coating over a fan blade "because by conventional design a fan blade has a convex side and a concave side."
4. Regarding Claims 8 and 20, the Examiner says Lada et al (referring to col. 3, lines 21-22) teaches that the coating thickness is about 0.04 to about 0.08 mm.

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5. Regarding Claim 10, the Examiner says Hinson (referring to col. 3, lines 34-36) teaches a metal-coated substrate that is treated for a period of time of about 1-20 minutes.
6. Regarding Claims 15-17, the Examiner says Hinson (referring to col. 3, lines 2-5) teaches that the etchant solution is typically an acid solution such as hydrochloric, hydrofluoric, nitric acid, as well as mixtures thereof.
7. Regarding Claim 18, the Examiner refers to the rejection of Claim 5.
8. Regarding Claim 19, the Examiner says it would have been obvious to have a higher thickness in the direction from the interior section to the perimeter section "because at least the interior section is in contact with the etchant solution."
9. Regarding Claim 21, the Examiner says Hinson (referring to col. 2, lines 21-25) teaches that the blade has a leading edge.

Applicants respectfully traverse this rejection. Contrary to what the Examiner suggests, the method of Hinson is not the same or similar to the method of Claims 4, 7-12, 14-21, as amended, or the method of new Claims 22-24. As clearly taught by Hinson, his method applies a coating to a metal surface that acts as a temporary barrier to the etchant that attacks the metal surface, and then etches the coated metal surface to roughen it. See col. 1, lines 4-6 and 37-44. By contrast, the method of amended Claims 4, 7-12, 14-21, as well as new Claims 22-24, does not simply roughen the cladding treated with etchant. Instead, the method of these Claims treats the cladding with the etchant so that the cladding can be removed from the substrate that it is adhered to.

Applicants submit that Claims 7-11 and 14-21, as amended, as well as new Claim 24, are distinguishable over Hinson for an additional reason. Hinson nowhere teaches that his method selectively roughens, much less selectively removes, the coating on the metal surface, and especially along one edge of a turbine blade. By contrast, in the

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method Claims 7-11 and 14-21, as amended, and new Claim 24, the cladding positioned along the edge of airfoil is selectively treated and removed from the substrate.

Regarding the Examiner's specific comments on Claim 4, Applicants respectfully submit that the Examiner's reliance on col. 2, lines 14-25 and line 66 to col. 2, lines 2-4 of Hinson to suggest motivation to substitute hydrofluoric acid for the acids taught by Lada et al is misplaced. All that Hinson teaches is the use of hydrofluoric acid (and other acids such as hydrochloric and nitric acid) to roughen the coated metal surface. There is nothing in Hinson that would suggest hydrofluoric acid would be suitable to remove titanium cladding adhered to a substrate according to the method Claim 4. Applicants have a similar comment on the Examiner's reliance on col. 3, lines 2-5 with regard to the method of Claims 15-17.

Regarding the Examiner's specific comments on Claims 7, 9, 11 and 14, Applicants respectfully submit that the Examiner's reliance on col. 2, lines 21-25 of Hinson is misplaced. All that this portion of Hinson says is that the internal surface of the titanium leading edge is roughened prior to adhesive bonding to the composite fan blade. Indeed, Hinson does not refer to the internal surface of the substrate. By contrast, the method of Claims 7, 9, 11 and 14 involves the interior sections of the substrate where the cladding is adhered to prior to its removal.

Regarding the Examiner's specific comments on Claims 8 and 20, Applicants respectfully submit that all that col. 3, lines 21-22 of Lada et al teaches is that the particular coating removed in its method has the indicated thickness. Nothing in this particular teaching would suggest a method of removing cladding have the thickness defined in Claims 8 or 20.

Regarding the Examiner's specific comments on Claim 10, Applicants respectfully submit that all that col. 3, lines 34-36 of Hinson teaches is that the coated metal substrate in its method is etched for a period of time within the range of 1-20 minutes. Nothing in this particular teaching would teach or suggest a method of treating cladding adhered to a substrate with an etchant for the time indicated in Claim 10.

Regarding the Examiner's comment on Claim 19, Applicants respectfully disagree with the Examiner's suggestion that Hinson (or Lada et al) would teach as obviousness treating with an etchant a cladding whose thickness increases in the direction from the interior section to the perimeter section. Nowhere do either of these

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references teach that the respective methods are used to treat coatings, much less claddings, where the thickness increases in the direction defined by the method of Claim 19.

Regarding the Examiner's comment on Claim 21, all that col. 2, lines 21-25 of Hinson teaches is that a fan blade has a leading edge. Nothing in this reference would suggest that its method can be (or should be) used to selectively roughen, much less selectively remove, cladding that is positioned on the leading edge of the airfoil according to the method of Claim 21.

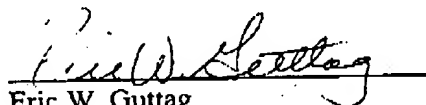
For the foregoing reasons, Applicants submit that Claims 4, 7-12, 14-21, as amended, as well as new Claims 22-24 are unobvious over Lada et al, even in view of Hinson.

C. Conclusion

In conclusion, Applicants submit that Claims 1-24, as amended, are novel and unobvious over the prior art relied on by the Examiner. Accordingly, Applicants respectfully request that the above application be allowed to issue with Claims 1-24, as amended.

Respectfully submitted,

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Information Disclosure Statement by Applicant (Use several sheets if necessary)  (37 CFR 1.98(b))				Applicant: Larry D. Cline et al			
				Filing Date: October 21, 2001		Group: 1765	
U.S. Patent Documents							
Examiner Initial		Patent Number	Issue Date	Patentee	Class	Subclass	Filing Date if appropriate
	AA	5,281,062	01/25/94				
	AB	5,944,909	08/31/99				
	AC	6,413,051 B1	07/02/02				
	AD						
	AE						
	AF						
	AG						
	AH						
	AI						
	AJ						
	AK						
Foreign Patent or Published Foreign Patent Application							
		Document Number	Publication Date	Country or Patent Office	Class	Subclass	Translation Yes No
	AL	1,162,286	12/12/02	Europe			Yes
	AM						Yes
	AN						Yes
	AO						Yes
	AP						Yes
Other Documents (including Author, Title, Date, Place of Publication)							
	AQ	Patent Abstracts of Japan, vol. 1999, No. 09, July 30, 1999 (abstract of JP 11-10780 A to Toshiba published April 20, 1999)					
	AR						
	AS						
Examiner				Date Considered			
Examiner: Initial citation considered. Draw line through citation if not in conformance and not considered. Include copy of this form with next communication to applicant.							

Substitute Disclosure form (PTO-1449)

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# Merriam- Webster's Collegiate® Dictionary

TENTH EDITION

Merriam-Webster, Incorporated  
Springfield, Massachusetts, U.S.A.

# A GENUINE MERRIAM-WEBSTER

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Made in the United States of America

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Pref.  
Explanatory Ch  
Explanatory Nc  
The English Language in the Diction  
Guide to Pronunciat  
Abbreviations in This W  
Pronunciation Synt  
A Dictionary of the English Langu  
Abbreviations and Symbols for Chemical Elem  
Foreign Words and Phr  
Biographical Na  
Geographical Na  
Signs and Sym  
A Handbook of  
In

• **W**

**clack-an** \ˈkla-kən\ *n* [ME, fr. ScGael] (15c) *Scot & Irish*: HAMLET  
**clack** \ˈklak\ *vb* [ME, of imit. rigin] *w* (13c) 1: CHATTER, PRATTLE 2: to make an abrupt striking sound or series of sounds 3 *of fowl*: CACKLE, CLUCK ~ *w* 1: to cause to make a clatter 2: to produce with a chattering sound; *specif*: BLAB — **clack-er** *n*  
**clack** *n* (15c) 1 *a*: rapid continuous talk; CHATTER *b*: TONGUE 2 *archaic*: an object (as a valve) that produces clapping or rattling noises usu. in regular rapid sequence 3: a sound of clacking (the ~ of a typewriter)  
**Clack-ton-ian** \ˈklak-tō-nē-ən\ *adj* [Clacton-on-Sea, England] (1932) 1: of or relating to a Lower Paleolithic culture usu. characterized by stone flakes with a half cone at the point of striking  
**clad** \ˈklad\ *past and past part of CLOTH*  
**clad** *adj* [ME, pp. of *clothen* to clothe] (14c) 1: being covered or clothed (ivy-clad buildings) 2 *of a coin*: consisting of outer layers of one metal bonded to a core of a different metal  
**clad** *v* *clad*; **clad-ding** (1939): SHEATH, FACE; *specif*: to cover (a metal) with another metal by bonding  
**clad** *n* (1941) 1 *a*: a composite material formed by cladding *b*: a clad coin 2: CLADDING; *specif*: the outer layer of a clad coin  
**clad- or clado-** *comb form* [NL, fr. Gk *klad-*, *klado-*, fr. *klados* branch, shoot of a tree; akin to OE *holt* woods — more at *HOLT*]: slip: sprout (*cladophyll*)  
**clad-ding** \ˈkla-dɪŋ\ *n* (1936): something that covers or overlays; *specif*: metal coating bonded to a metal core  
**clade** \ˈklad\ *n* [Gk *klados*] (1911): a group of biological taxa (as species) that includes all descendants of one common ancestor  
**cla-dis-tics** \ˈkla-ˈdis-tiks, ˈkla-ˈsɪ-ˈstɪks\ *n* *pl* but *sing in constr* (1965): a system of biological taxonomy that defines taxa uniquely by shared characteristics not found in ancestral groups and uses inferred evolutionary relationships to arrange taxa in a branching hierarchy such that all members of a given taxon have the same ancestors — **cla-dist** \ˈkla-dist\ *n* — **cla-dis-tic** \-ˈdis-tɪk\ *adj* — **cla-dis-ti-cal-ly** \-ti-k(ə)-li\ *adv*  
**cla-doc-er-an** \ˈkla-ˈdɒ-sə-rən\ *n* [NL *Cladocera*, fr. *clad-* + Gk *keras* horn — more at *HORN*] (1909): any of an order (Cladocera) of minute chiefly freshwater branchiopod crustaceans that includes the water fleas  
**clad-ode** \ˈkla-ˈdɒd\ *n* [NL *cladodium*, fr. Gk *klados*] (1870): CLADOPHYLL — **cla-do-di-al** \ˈkla-ˈdɒ-dɪ-əl\ *adj*  
**clad-o-gen-e-sis** \ˈkla-ˈdɒ-ˈjə-nə-sɪs\ *n* (1953): evolutionary change characterized by treelike branching of taxa — compare ANAGENESIS — **clad-o-gen-et-ic** \ˈkla-ˈdɒ-ˈjə-ne-tɪk\ *adj* — **clad-o-gen-et-i-cal-ly** \-ti-k(ə)-li\ *adv*  
**clad-o-gram** \ˈkla-ˈdɒ-gram\ *n* (1966): a branching diagrammatic tree used in cladistic classification to illustrate phylogenetic relationships  
**clad-o-phyll** \ˈkla-ˈdɒ-fɪl\ *n* (1879): a flattened photosynthetic branch assuming the form of and closely resembling an ordinary foliage leaf

**bling** (<ed over the rocks) — **clam-ber-er** \-ber-er, -mər-ər\ *n*  
**clam-my** \ˈkla-mə\ *adj* **clam-mi-er**; -est [ME, prob. fr. *clammen* to smear, stick, fr. OE *clāman*; akin to OE *clæg* clay] (14c) 1: being damp, soft, sticky, and (a ~ and intensely cold mist — Charles Dickens) 2: lacking human warmth (the ~ atmosphere of an institution) — **c** \ˈkla-mə-lē\ *adv* — **clam-mi-ness** \ˈkla-mē-nəs\ *n*  
**clam-or** \ˈkla-mər\ *n* [ME, fr. MF *clamour*, fr. L *clamor*, fr. cry out — more at *CLAIM*] (14c) 1 *a*: noisy shouting continuous noise 2: insistent public expression (as of protest) (a ~ against increased taxes)  
**clam-or** *vb* **clam-ored**; **clam-or-ing** \ˈklam-rɪŋ, ˈkla-mər-ɪ\ 1: to make a din 2: to become loudly insistent (<ed / peachment) ~ *vi* 1: to utter or proclaim insistently and to influence by means of clamor  
**clam-or** *vi* [origin unknown] (1611) *obs*: SILENCE  
**clam-or-ous** \ˈklam-rəs, ˈkla-mər-əs\ *adj* (15c) 1: marked by din or outcry: TUMULTUOUS (the busy ~ market) insistent *syn* see VOCIFEROUS — **clam-or-ous-ly** *adv* — **ous-ness** *n*  
**clam-our** \ˈkla-mər\ *chiefly Brit var of CLAMOR*  
**clamp** \ˈklamp\ *n* [ME, prob. fr. (assumed) MD *klampe*: a clamp bond, letter — more at *CLAIM*] (14c) 1: a device to bind or constrict or to press two or more parts together so that they are held firmly 2: any of various instruments or appliances brought together for holding or compressing something  
**clamp** *vi* (ca. 1696) 1: to fasten with or as if with a clamp place by decree: IMPOSE — often used with *on* (<ed *n* a c the riots) *b*: to hold tightly  
**clamp-down** \ˈklamp-ˈdaʊn\ *n* (1940): the act or action of regulations and restrictions more stringent (a ~ on charge bank loans, and other inflationary influences — *Time*)  
**clamp down** *vi* (1940): to impose restrictions: CRACK DOWN (the cops are clamping down on speeders)  
**clams casino** *n* *pl* but *sing or pl in constr*, often cap 2d C (19 on the half shell usu. topped with green pepper and baked on the half shell)  
**clam-shell** \ˈklam-ˈʃel\ *n* (ca. 1520) 1: the shell of a clam bucket or grapple (as on a dredge) having two hinged jaws excavating machine having a clamshell *e*: either of a pair in an airplane tail that open out and away from each other  
**clam up** *vi* (1916): to become silent  
**clam worm** *n* (1885): any of several large burrowing worms (as a nereid) often used as bait  
**clan** \ˈklan\ *n* [ME, fr. ScGael *clann* offspring, clan, fr. OIr. *clann*, fr. L *planta* plant] (15c) 1 *a*: a Celtic group of Scottish Highlands comprising a number of households with claim descent from a common ancestor *b*: a group of pe-

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**co-ag-u-la-ble** \-u-  
on\ n  
la\ or -ulums [L] (1658): a

**E**; akin to OHG & ON *kol*  
1: a piece of glowing carbon  
3 a: a black or brownish  
by the partial decomposition  
dr and under the influence of  
1 temperature that is widely  
or a quantity of the fuel bro-

**HAR** 2: to supply with coal

**a-lesc-ing** [L *coalescere*, fr.  
(ca. 1636) 1: to grow to-  
se (separate townships have  
—Donald Gould) b: to  
ple with different points of  
owitz) 3: to arise from the  
anized and a popular resis-  
tes) ~ vt: to cause to unite  
ess market —Walter Meade)  
a\ n —**co-a-les-cent** \-s'nt\

ch in coal deposits  
ral blackish or dark-backed

as a: the mixture of gases  
e by carbonizing bituminous  
hting

**coaster brake** n (1899): a brake in the hub or in the rear wheel of a bicy-  
cle operated by reverse pressure on the pedals  
**coaster wagon** n (1911): a child's toy wagon often used for coasting  
**coast guard** n (1833) 1: a military or naval force employed in guard-  
ing a coast or responsible for the safety, order, and operation of mari-  
time traffic in neighboring waters 2 usu c **st-guard chiefly Brit**  
: COASTGUARDSMAN

**coast-guard-man** \-kōs(t)-gärdz-mən\ or **coast-guard-man** \-gärd-  
m n\ n (ca. 1891): a member of a coast guard

**coast-land** \-land\ n (1852): land bordering the sea

**coast-line** \-līn\ n (ca. 1859) 1: a line that forms the boundary be-  
tween the land and the ocean or a lake 2: the outline of a coast

**coast redwood** n (ca. 1897): REDWOOD 3a

**coast-to-coast** \-kōs-tə-'kōst\ adj (1911): extending or airing across  
an entire nation or continent

**coast-ward** \-kōs-tward\ or **coast-wards** \-twərdz\ adv (1853): to-  
ward the coast — **coastward** adj

**coat** \-kōt\ n, often attrib [ME *cote*, fr. MF, of Gmc origin; akin to  
OHG *kozza* coarse wool mantle] (14c) 1 a: an outer garment worn  
on the upper body and varying in length and style according to fashion  
and use b: something resembling a coat 2: the external growth on  
an animal 3: a layer of one substance covering another (a ~ of paint)  
— **coat-ed** \-kō-təd\ adj — **coat-less** adj

**coat** vt (14c) 1: to cover with a coat 2: to cover or spread with a  
finishing, protecting, or enclosing layer — **coat-er** n

\ə\ abut \ə\ kitten, F table \ər\ further \ə\ ash \ä\ ace \ä\ mop, mar  
\ə\ out \ch\ chin \e\ bet \ē\ easy \g\ go \i\ hit \i\ ice \j\ job  
\ŋ\ sing \ō\ go \ō\ law \ō\ boy \th\ thin \th\ the \ū\ loot \ū\ foot  
\y\ yet \zh\ vision \ä, k, ŋ, œ, æ, ie, ū\ see Guide to Pronunciation